

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

**JACOB SHOCHAT'S MOTION TO EXPEDITE BRIEFING REGARDING
JACOB SHOCHAT'S MOTION FOR LEAVE TO INTERVENE**

COMES NOW, Proposed-Intervenor Jacob Shochat (“Intervenor Shochat”) who, pursuant to Local Civil Rule 7.1(g), respectfully moves this Court for an order shortening the time for Plaintiffs and Defendants to respond to Jacob Shochat’s Motion for Leave to Intervene and Memorandum of Law (the “Intervention Motion”), which is being filed concurrently herewith.

As described more fully in the Intervention Motion, Intervenor Shochat seeks to intervene in the instant action in order to file an opposition to the currently-pending Plaintiffs' Motion to Lift Stay, *see* Dkt. No. 44 (the "Lift Stay Motion"), and through this motion seeks to shorten the time for the briefing of the Intervention Motion in an effort to ensure that, if granted, this Court has an opportunity to timely and adequately consider Intervenor Shochat's opposition memorandum before ruling on the Lift Stay Motion.

The issues presented in the Intervention Motion are not complex, and providing a completed briefing process and a ruling from this Court within a shortened period is reasonable. The Intervention Motion merely requests that this Court issue an order

allowing Intervenor Shochat to intervene in this action for the purpose of filing an opposition to the currently pending Lift Stay Motion. The parties to the action, if opposed to the Intervention Motion, would only be required to respond to this single motion—not an undue burden. A drawn out and extended briefing schedule will simply delay the point in time when this Court will rule on the Intervention Motion and, accordingly, possibly require the Court to rule on the Lift Stay Motion without the benefit of considering Intervenor Shochat's opposition.

Therefore, Intervenor Shochat respectfully requests this Court require any party wishing to respond to the Intervention Motion file such an opposition within a shortened period of time, as so ordered by this Court.

Respectfully submitted this 15 day of May, 2012

By:/s/ Don S. Strong

STRONG, MARTIN & ASSOCIATES, PLLC.

Don S. Strong, OBA No. 13874

dss@strongmartin.com

G. Stephen Martin, OBA No. 17091

gsm@strongmartin.com

2700 First National Center

120 North Robinson Avenue

Oklahoma City, Oklahoma 73102

Telephone: (405) 604-7500

Facsimile: (405) 604-7503

KAHN SWICK & FOTI, LLC

Lewis S. Kahn (*pro hac vice* application to be filed)

lewis.kahn@ksfcounsel.com

Albert M. Myers (*pro hac vice* application to be filed)

albert.myers@ksfcounsel.com

Melinda A. Nicholson (*pro hac vice* application to be filed)

melinda.nicholson@ksfcounsel.com

206 Covington Street
Madisonville, Louisiana 70447
Telephone: (504) 455-1400
Fax: (504) 455-1498

Attorneys for Proposed-Intervenor Jacob Shochat

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 15, 2012, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the court's electronic filing system. I also certify that I have served this filing by first class mail to all counsel of record listed below.

/s/ Don S. Strong
Don S. Strong

HOLLOWAY BETHEA & OSENBAUGH PLLC

Kenyatta R. Bethea
3035 N.W. 63rd Suite, 102N
Oklahoma City, OK 73116

Liaison Counsel for Plaintiffs

ROBBINS UMEDA

Jay N. Razzouk
Brian J. Robbins
George C. Aguilar
Lauren N. Ochenduszko
600 B Street, Suite 1900
San Diego, CA 92101

Co-Lead Counsel for Plaintiffs

HOLZER HOLZER & FISTEL, LLC

MARSHALL P. DEES
200 Ashford Center North, Suite 300
Atlanta, GA 30338

Co-Lead Counsel for Plaintiffs

MCAFEE & TAFT, A.P.C.

James R. Webb
10th Floor, Two Leadership Square
211 North Robinson

Oklahoma City, OK 73102

Counsel for Defendants

ORRICK, HERRINGTON & SUTCLIFFE LLP

Robert P. Varian

M. Todd Scott

The Orrick Building

405 Howard Street

San Francisco, CA 94105-2669

Counsel for Defendants